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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

THERESA MADRID,

Plaintiff,

vs.

ANDREW SAUL,
 Commissioner of Social Security,

Defendant.

CIVIL NO. 4:20-cv-04880-HSG

STIPULATION FOR 30-DAY
 EXTENSION OF TIME FOR
 DEFENDANT TO FILE ANSWER AND
 CERTIFIED ADMINISTRATIVE
 RECORD (SECOND REQUEST) AND
 ORDER

TO THE HONORABLE HAYWOOD S. GILLIAM, JR., DISTRICT JUDGE OF THE
 DISTRICT COURT:

The parties, by and through their undersigned attorneys, stipulate that Defendant Andrew Saul shall have an additional 30 days, until February 3, 2021, in which to file the Answer and Electronic Certified Administrative Record. Defendant's Answer and Electronic Certified Administrative Record are currently due to be filed by January 4, 2021.

As described in the first motion for extension, in light of the global COVID-19 pandemic, SSA has taken the unprecedented step of suspending in-office services to the public:

<https://www.ssa.gov/coronavirus/>. For purposes of this particular case, the public health emergency pandemic has significantly affected operations in the Social Security Administration's Office of

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Appellate Operations (OAO) in Falls Church, Virginia. That office is responsible for physically producing the administrative record that is required to adjudicate the case under Sections 205(g) and (h) of the Social Security Act, 42 U.S.C. § 405(g) and (h). *See* SSA Program Operations Manual System GN 03106.025.

As detailed in the attached declaration, at the end of November, OAO had more than 10,200 new court cases waiting to be processed. Additionally, OAO is focusing its efforts on processing the most aged cases and the pandemic has adversely affected the contractors' capacity to deliver hearing transcripts. Although overall the timeframe for delivering an administrative record has improved, the backlog, prioritizing aged cases, and contractor capacity continue to cause some delays.

Given the volume of pending cases and the continued constraints, Defendant respectfully requests a second extension in which to respond to the Complaint until February 3, 2021.

Respectfully submitted,

Date: January 4, 2021

By: /s/ Sarah Thompson-Peer*
SARAH THOMPSON-PEER
(*as authorized by email on Dec. 31, 2020)
Attorney for Plaintiff

Date: January 4, 2021


DAVID L. ANDERSON
United States Attorney

By: /s/ Annabelle J. Yang
ANNABELLE J. YANG
Special Assistant United States Attorney

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: 1/5/2021


HON. HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT JUDGE